

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CAROL BERGSON,

Plaintiff,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

CASE NO. 2:17-cv-01441-RSM

STIPULATED MOTION AND
ORDER TO EXTEND EXPERT
DISCLOSURE AND DISCOVERY
DEADLINES

STIPULATION

The parties, by and through counsel, and hereby stipulate and move the Court for an Order extending the expert disclosure deadline in this case from May 8, 2019 until June 7, 2019; and the discovery deadline from July 8, 2019 to August 7, 2019. The parties are not requesting an extension of any other deadlines.

The parties have been diligently and cooperatively participating in discovery in this case. Discovery is incomplete in part due to Defendants' request for discovery while Plaintiff is absent from the United States; an absence Defendants did not anticipate. She is expected to return to the United States on or about July 16, 2019. Specifically, Defendants seek a second discovery deposition of the Plaintiff, an inspection of her residence, and a Rule 35 medical evaluation. Accordingly, the parties agree that there is good cause for, and that they may mutually benefit

1 from, additional time to conduct discovery and prepare expert opinions, and that, while Plaintiffs
2 objections, if any, to specific discovery requests are reserved, the parties anticipate no unfair
3 prejudice to any party as a result of this extension.
4

5 DATED this 8th day of May, 2019.

6 **SO STIPULATED**

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1 **ORDER**

2 The Court, having reviewed the parties' stipulated motion and the record in this
3 matter and being fully informed, finds good cause exists to extend the expert disclosure
4 deadline until June 7, 2019; and the discovery deadline until August 8, 2019, as
5 requested. As such, and the parties having so stipulated and agreed, it is hereby so
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7 **ORDERED.**
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9 Dated this 13 day of May 2019.
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12 RICARDO S. MARTINEZ
13 CHIEF UNITED STATES DISTRICT JUDGE
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16 **Presented by:**

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20 s/ Tricia Boerger

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